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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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BOWLES & JOHNSON, PLLC,

*Plaintiff,*

Case No. 1:22-cv-06047-DLC

*v.*

SCOTT H. BERNSTEIN, ESQ., LAW OFFICES OF SCOTT H. BERNSTEIN LLC, MICHAEL P. PASQUALE, ESQ., THE LAW OFFICES OF MICHAEL P. PASQUALE LLC, SKOLNICK LEGAL GROUP, P.C., and RODNEY A. OMANOFF,

**DECLARATION OF MICHAEL P.  
PASQUALE**

*Defendants.*

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I, MICHAEL P. PASQUALE, hereby declare as follows:

1. I am an attorney at law of the states of New York and New Jersey and managing member of the Law Offices of Michael P. Pasquale, LLC, *pro se* defendants in the above-captioned matter. This Declaration is submitted in support of defendants Michael P. Pasquale and the Law Offices of Michael P. Pasquale, LLC's Motion to Dismiss Plaintiff's Amended Complaint.

2. Attached hereto as Exhibit A is a true copy of the Chapter 7 Trustee's Complaint against Bradley Reifler, his family members and various trusts and entities, filed in the Bankruptcy Court, Southern District of New York, dated January 19, 2019, Case No.: 17-35075 (CGM).

3. Attached hereto as Exhibit B is a true copy of relevant portions of the Verified Complaint filed in the New York State court action of *Forefront Partners v. Omanoff, et al.*, dated February 24, 2017, Index No. 650973/2017.

4. Attached hereto as Exhibit C is a true copy of the of relevant portions of the Amended Verified Complaint filed in the New York State court action of *Forefront Partners v. Omanoff, et al.*, dated June 16, 2017, Index No. 650973/2017.

5. Attached hereto as Exhibit D is a true copy of the October 26, 2016 Declaration of Bradley C. Reifler.

6. Attached hereto as Exhibit E is a true copy of the transcript of the March 7, 2018 deposition of Bradley C. Reifler, taken in the in the proceedings in the Bankruptcy Court, Southern District of New York, Adv. Pro. No. 17-09016.

7. Attached hereto as Exhibit F is a true copy of the transcript of the proceedings held on March 15, 2022 in the in the proceedings in the Bankruptcy Court, Southern District of New York, Adv. Pro. No. 22-09002.

8. Attached hereto as Exhibit G is a true copy of the transcript of the proceedings held on April 19, 2022 in the in the proceedings in the Bankruptcy Court, Southern District of New York, Adv. Pro. No. 22-09002.

9. Attached hereto as Exhibit H is a true copy of the Amended Complaint in the proceedings in the Bankruptcy Court, Southern District of New York, Adv. Pro. No. 22-09002.

10. Attached hereto as Exhibit I is a true copy of the May 10, 2022 motion to disqualify counsel filed in the proceedings in the Bankruptcy Court, Southern District of New York, Adv. Pro. No. 22-09002.

11. Attached hereto as Exhibit J is a true copy of the May 5, 2022 guilty plea and factual basis in the case of USA v. Reifler.

12. Attached hereto as Exhibit K is a true copy of the Complaint in *Omanoff v. Bradley Reifler, et al.*, filed in the District Court for the Southern District of New York on July 8, 2022.

13. Attached hereto as Exhibit L is a true copy of the July 18, 2022 motion for sanctions filed by BoJo against Defendants in the aforementioned New York State court action, Index No. 650973/2017.

14. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 20, 2022

/s/ Michael P. Pasquale  
Michael P. Pasquale